- 1						
1	H. STAN JOHNSON (SBN 0265)	MICHAEL P. DULIN (admitted pro hac vice)				
2	STEVEN B. COHEN (SBN 2327) COHEN JOHNSON LLC	POLSINELLI PC 1401 Lawrence Street, Suite 2300				
2	375 E. Warm Springs Road, Suite 104	Denver, CO 80202				
3	Las Vegas, NV 89119 T: 702.823.3500	T: 303.572.9300 Email: mdulin@polsinelli.com				
4	Email: sjohnson@cohenjohnson.com	<u>.</u>				
5	Email: scohen@cohenjohnson.com	MELENIE VAN (admitted pro hac vice) POLSINELLI LLP				
	COLBY B. SPRINGER (admitted pro hac vice)	2049 Century Park East, Suite 2900				
6	MIYA YUSA (admitted <i>pro hac vice</i> ) Polsinelli LLP	Los Angeles, CA 90067 T: 310.229.1355				
7	Three Embarcadero Center, Suite 2400	Email: mvan@polsinelli.com				
8	San Francisco, CA 94111 T:415.248.2100	EMILY C. McNALLY (admitted pro hac vice)				
	Email: cspringer@polsinelli.com	POLSINELLI PC				
9	Email: myusa@polsinelli.com	1000 Second Avenue, Suite 3500 Seattle, WA 98104				
10		T: 206-393-5413				
11	Attorneys for Plaintiff	Email: emcnally@polsinelli.com				
	IMAGEKEEPER, LLC					
12						
13	IN THE UNITED STATES DISTRICT COURT					
14	FOR THE DISTRICT OF NEVADA					
15						
16	IMAGEKEEPER, LLC, a Nevada Limited	Case No. 2:20-cv-01470-CDS-VCF				
	Liability Company,					
7		JOINT STIPULATION AND ORDER TO				
17	Plaintiff	EXTEND TIME TO RESPOND TO				
18	Plaintiff v.	EXTEND TIME TO RESPOND TO MOTIONS FOR SUMMARY				
18	v.					
18 19	v. WRIGHT NATIONAL FLOOD INSURANCE SERVICES, LLC, a Delaware	MOTIONS FOR SUMMARY				
18	v. WRIGHT NATIONAL FLOOD INSURANCE SERVICES, LLC, a Delaware limited liability Company, and EVOKE	MOTIONS FOR SUMMARY				
18 19	v. WRIGHT NATIONAL FLOOD INSURANCE SERVICES, LLC, a Delaware	MOTIONS FOR SUMMARY				
18 19 20	V.  WRIGHT NATIONAL FLOOD INSURANCE SERVICES, LLC, a Delaware limited liability Company, and EVOKE TECHNOLOGIES PRIVATE LIMITED, an	MOTIONS FOR SUMMARY				
18 19 20 21	V.  WRIGHT NATIONAL FLOOD INSURANCE SERVICES, LLC, a Delaware limited liability Company, and EVOKE TECHNOLOGIES PRIVATE LIMITED, an Ohio foreign corporation,	MOTIONS FOR SUMMARY				
18 19 20 21 22 23	WRIGHT NATIONAL FLOOD INSURANCE SERVICES, LLC, a Delaware limited liability Company, and EVOKE TECHNOLOGIES PRIVATE LIMITED, an Ohio foreign corporation,  Defendants	MOTIONS FOR SUMMARY JUDGMENT				
18 19 20 21 22 23 24	V.  WRIGHT NATIONAL FLOOD INSURANCE SERVICES, LLC, a Delaware limited liability Company, and EVOKE TECHNOLOGIES PRIVATE LIMITED, an Ohio foreign corporation,  Defendants  Pursuant to Civil Local Rules IA 6-1 and	MOTIONS FOR SUMMARY JUDGMENT  6-2 and LR 7-2, Plaintiff ImageKeeper, LLC				
18 19 20 21 22 23 24 25	V.  WRIGHT NATIONAL FLOOD INSURANCE SERVICES, LLC, a Delaware limited liability Company, and EVOKE TECHNOLOGIES PRIVATE LIMITED, an Ohio foreign corporation,  Defendants  Pursuant to Civil Local Rules IA 6-1 and ("Plaintiff" or "ImageKeeper") and Defendants	MOTIONS FOR SUMMARY JUDGMENT  6-2 and LR 7-2, Plaintiff ImageKeeper, LLC Wright National Flood Insurance Services, LLC				
18 19 20 21 22 23 24	WRIGHT NATIONAL FLOOD INSURANCE SERVICES, LLC, a Delaware limited liability Company, and EVOKE TECHNOLOGIES PRIVATE LIMITED, an Ohio foreign corporation,  Defendants  Pursuant to Civil Local Rules IA 6-1 and ("Plaintiff" or "ImageKeeper") and Defendants V ("Wright Flood") and Evoke Technologies Priva	MOTIONS FOR SUMMARY JUDGMENT  6-2 and LR 7-2, Plaintiff ImageKeeper, LLC Wright National Flood Insurance Services, LLC te Limited ("Evoke") (collectively the "Parties")				
18 19 20 21 22 23 24 25	V.  WRIGHT NATIONAL FLOOD INSURANCE SERVICES, LLC, a Delaware limited liability Company, and EVOKE TECHNOLOGIES PRIVATE LIMITED, an Ohio foreign corporation,  Defendants  Pursuant to Civil Local Rules IA 6-1 and ("Plaintiff" or "ImageKeeper") and Defendants	MOTIONS FOR SUMMARY JUDGMENT  6-2 and LR 7-2, Plaintiff ImageKeeper, LLC Wright National Flood Insurance Services, LLC te Limited ("Evoke") (collectively the "Parties")				
18 19 20 21 22 23 24 25 26	WRIGHT NATIONAL FLOOD INSURANCE SERVICES, LLC, a Delaware limited liability Company, and EVOKE TECHNOLOGIES PRIVATE LIMITED, an Ohio foreign corporation,  Defendants  Pursuant to Civil Local Rules IA 6-1 and ("Plaintiff" or "ImageKeeper") and Defendants V ("Wright Flood") and Evoke Technologies Priva	MOTIONS FOR SUMMARY JUDGMENT  6-2 and LR 7-2, Plaintiff ImageKeeper, LLC Wright National Flood Insurance Services, LLC te Limited ("Evoke") (collectively the "Parties")				

MOTIONS FOR SUMMARY JUDGMENT

opposition to and replies in support of Defendants' Motions for Summary Judgment, filed at ECF Nos. 259 and 263.

Defendants, with no objection from ImageKeeper, previously requested an extension of the time for filing dispositive motions. ECF No. 256. This Court granted that request. ECF No. 257. Under the current schedule and Local Rule 7-2(b), responses to Defendants' motions are to be filed on or before April 14, 2023, and Defendants' replies are to be filed on or before April 28, 2023. Due to scheduling conflicts with other matters for both Plaintiff ImageKeeper and Defendant Evoke, the parties have conferred and agree that an extension of these deadlines is necessary so that the parties may properly consider and respond to the summary judgment filings. Defendant Wright Flood consents to this approach. The parties agree that a thirty-day extension to Plaintiffs April 14, 2023 deadline, followed by a thirty-day period for Defendants to submit their replies would appropriately accommodate the parties' needs.

WHEREFORE, the undersigned Parties respectfully request that the Court approve the present stipulation as follows:

ACTION ITEM	DEADLINE (ECF NO. 257 and L.R. 7-2(b))	NEW DEADLINE REQUESTED
Plaintiff's Response in Opposition to Defendants' Motions for Summary Judgment	April 14, 2023	May 15, 2023
Defendants' Reply in Support of Motions for Summary Judgment	April 28, 2023	June 14, 2023 (30 days after Plaintiff's Opposition)

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

	Case 2:20-cv-01470-CDS-VCF D	ocument	t 268	Filed 04/10/23	Page 3 of 3	
1 2	Dated: April 7, 2023		Respe	ctfully Submitted,		
3		D	/s/ Col	lby B. Springer		
4		·	Stever	n Johnson n B. Cohen		
5			Miya `	B. Springer Yusa el P. Dulin		
6			Melen	ie Van C. McNally		
7			_	neys for Plaintiff		
8				SEKEEPER, LLC		
9						
10						
11	Dated: April 7, 2023					
12				ry W. Ahearn		
13			D. Stu	W. Ahearn art Bartow		
14				nica C. Anderson B. Heidtke		
15			Attorn	eys for Defendant		
16 17				HT NATIONAL ICES, LLC	FLOOD INSURANCE	
18	Dated: April 7, 2023			,		
19						
20				enn F. Meier	W000000)	
21			Glenn	d L. Prunty (NSB F. Meier (NSB #0	006950)	
22			Bethai	ny L. Rabe (NSB a	<del>(</del> #011691)	
23				leys for Defendant XE TECHNOLOG	: IES PRIVATE LIMITED	
24			IT IS	SO ORDERED:		
25						
26		<del>.</del>	TA IZEE	Y/r	DICT HID CE	
27		Ĺ	JNITE	D STATES DIST	RICT JUDGE	
28		Γ	DATEI	D: April 10, 2023		
	JOINT STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO MOTIONS					

FOR SUMMARY JUDGMENT